

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

CONTENTGUARD HOLDINGS, INC., )  
Plaintiff, )  
v. )  
AMAZON.COM, INC.; APPLE INC.; )  
BLACKBERRY LIMITED (FKA )  
RESEARCH IN MOTION LIMITED) AND )  
BLACKBERRY CORPORATION (FKA )  
RESEARCH IN MOTION )  
CORPORATION); HTC CORPORATION )  
AND HTC AMERICA, INC.; HUAWEI ) No. 2:13-cv-01112 (JRG)  
TECHNOLOGIES CO., LTD. AND )  
HUAWEI DEVICE USA, INC.; ) JURY TRIAL DEMANDED  
MOTOROLA MOBILITY LLC; SAMSUNG )  
ELECTRONICS CO., LTD., SAMSUNG )  
ELECTRONICS AMERICA, INC., and )  
SAMSUNG TELECOMMUNICATIONS )  
AMERICA, LLC, )  
Defendants. )  
and )  
DIRECTV, LLC, )  
Intervener. )

**DIRECTV, LLC'S NOTICE OF JOINDER IN**  
**DEFENDANTS' MOTION TO CHANGE VENUE TO THE NORTHERN**  
**DISTRICT OF CALIFORNIA (DKT. NO. 110)**

DIRECTV, LLC's ("DIRECTV") respectfully notifies the Court that it joins Defendants' Motion to Change Venue to the Northern District of California (the "Transfer Motion"). On April 15, 2014, Defendants moved to transfer this case to the U.S. District Court for the Northern District of California.<sup>1</sup> *See* Dkt. No. 110. ContentGuard Holdings, Inc. ("ContentGuard") has opposed the Transfer Motion, *see* Dkt. Nos. 125, 148, and the Transfer Motion is pending before the Court.<sup>2</sup>

In its motion to intervene filed on August 15, 2014, DIRECTV advised the Court that it had met and conferred with counsel of record for the named parties in this case regarding DIRECTV's intention to join the Transfer Motion should the Court grant DIRECTV's motion to intervene. The parties did not oppose DIRECTV joining the Transfer Motion. *See* Dkt. No. 199 at 1 n.1.

For the reasons stated in DIRECTV's motion to intervene and the Transfer Motion and subsequent filings in support, DIRECTV respectfully joins Defendants' request to transfer the case to the Northern District of California. DIRECTV submits that because it is a California limited liability company that maintains its headquarters, principal offices, and development facilities in El Segundo, California, nothing about its presence in the case undermines the Transfer Motion or renders a transfer of venue to the Northern District of California any less appropriate. DIRECTV therefore joins Defendants' request that this case should be transferred to the Northern District of California.

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<sup>1</sup> The following parties joined the Transfer Motion: Amazon.com Inc., BlackBerry Corporation (f/k/a Research In Motion Corporation), Blackberry Limited (f/k/a Research in Motion Limited), HTC America, Inc., HTC Corporation, Huawei Device USA, Inc., Huawei Technologies Co., Ltd., Motorola Mobility LLC, Samsung Electronics America, Inc., Samsung Electronics Co., Ltd., Samsung TeleCommunications America, LLC.

<sup>2</sup> DIRECTV also reserved the right to ask for a severance at the appropriate time. *See* Dkt. No. 199 at 2 n.2. ContentGuard has presented a potential severance proposal to DIRECTV and DIRECTV is currently considering that proposal. *See* Dkt. No. 268 n.2.

Accordingly, DIRECTV respectfully notifies the Court that it joins the Transfer Motion.

Respectfully submitted this 13th day of November, 2014.

*/s/ Charles Everingham IV*

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served this 13th day of November, 2014, with a copy of the foregoing document and supporting attachments via the Court's CM/ECF system.

*/s/ Charles Everingham IV* \_\_\_\_\_

Charles Everingham IV

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rule CV-7(h), DIRECTV has contacted the named parties to this lawsuit and informed them of its intent to join the Transfer Motion. After meeting and conferring with the named parties' counsel, they have represented that the current parties are not opposed to DIRECTV joining the Transfer Motion. Accordingly, this notice of joinder is unopposed.

*/s/ Charles Everingham IV* \_\_\_\_\_

Charles Everingham IV